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Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## UNITED STATES DISTRICT COURT 2025 APR 18 PM 2:56

for the

CENTRAL District of CALIFORNIA

Division

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: GSA

Case No.

2:25cv03461-MCS-  
(to be filled in by the Clerk's Office)

CPVCo)

CLARE JACOBS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SONY PICTURE ENTERTAINMENT INC., &amp;

TOMIE MUNDY

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

## COMPLAINT

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

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**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	CLARE JACOBS		
Address	3674 EMPIRE DR. APT# 1		
	LOS ANGELES, CA 90034		
	City	State	Zip Code
County	LOS ANGELES COUNTY		
Telephone Number	(310)936-8255		
E-Mail Address	clarejacobs500@gmail.com		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

## Defendant No. 1

Name	SONY PICTURE ENTERTAINMENT INC.		
Job or Title (if known)			
Address	10202 WASHINGTON BLVD.		
	CULVER CITY	CA	90232
	City	State	Zip Code
County	LOS ANGELES COUNTY		
Telephone Number	(310)244-4000		
E-Mail Address (if known)	john.miller@sony.com		

☐ Individual capacity ☒ Official capacity

## Defendant No. 2

Name	TOMIE MUNDY		
Job or Title (if known)	SONY MANAGER		
Address	5100 S. VAN NESS AVE.		
	LOS ANGELES	CA	90062
	City	State	Zip Code
County	LOS ANGELES		
Telephone Number	(323) 610-5521		
E-Mail Address (if known)			

☒ Individual capacity ☐ Official capacity

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## Defendant No. 3

Name \_\_\_\_\_

Job or Title *(if known)* \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address *(if known)* \_\_\_\_\_☐

Individual capacity

☐

Official capacity

## Defendant No. 4

Name \_\_\_\_\_

Job or Title *(if known)* \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip Code \_\_\_\_\_

County \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-Mail Address *(if known)* \_\_\_\_\_☐

Individual capacity

☐

Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

☐Federal officials (a *Bivens* claim)☐

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
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### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Sony Pictures Entertainment, Inc., 10202 Washington Blvd.  
Culver City, CA 90232. February 2006 Plaintiff was hired by Sony  
and told not to disclose her disability to other Sony Executives by  
Defendant Tomie Mundy, and then he began quid pro quo sexual harassment.

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- B. What date and approximate time did the events giving rise to your claim(s) occur?

Began in February 2006 and continued until her wrongful termination  
which was 2023 after Defendant Mundy retired. Terminated 3 days after  
filing Workers Compensation claim. June 6th 2023.

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- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?  
Was anyone else involved? Who else saw what happened?)

For years plaintiff was obligated to have a quid pro quo sexual relationship  
with Defendant Tomie Mundy and told to only disclose her disability to him  
of having Multiple Sclerosis. He informed her that if other Sony executives  
knew they would fire her. Promises to Plaintiff of promotions and protection  
and constant sexual advances towards her made her feel obligated to him and  
she did what he asked. (Witnesses will be disclosed at a later date.) Plaintiff  
developed carpal tunnel, and serious back problems, and eye strain as a  
result of her near 19 year tenure. She filed a Workers Compensation claim  
on her work related injuries and was terminated there after which put her  
in total financial collapse.

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#### **IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Plaintiff has and is still suffering significant emotional distress, and post traumatic stress disorder, and severe insomnia. Her health has declined a great deal since her termination. She suffers from carpal tunnel syndrome (CTS), and neurological damage and degenerative disk disease and significant eye damage from years of straining her eyes staring at Sony computer screens. Plaintiff needs adequate physical therapy neurological treatment, and mental health treatment in counseling for the abuse suffered at the hands of Defendant Mundy. She needs psychotropic medications for depression and sleep deprivation and ongoing treatment for her carpal tunnel and degenerative disk disease. She needs medical support devices for her carpal tunnel and degenerative disk problems as well. She also needs to see a dietician due to the stress causing her appetite to decline and causing her vitamin deficiency as well.

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#### **V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Plaintiff is requesting that Sony Pictures Entertainment Inc. pay her \$3.5 million dollars in compensatory damages in medical costs, loss of property and financial inheritance, loss of frozen eggs for reproduction and accumulated debts incurred and financial collapse and destruction of credit health for financial well-being. Plaintiff is also requesting \$12,000,000.00 in punitive damages for pain & suffering and the harm caused after being wrongfully terminated Sony Pictures should be punished for discrimination of a person with a disability and punished for firing her after she filed a workers compensation claim. Defendant Tomie Mundy is requested to pay \$500,000.00 in compensatory damages for his cause of these events and he's requested to pay \$1.5 million dollars in punitive damages for all of the pain and suffering he caused Plaintiff and severe emotional distress and creating a complete toxic and hostile work environment.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

4/18/25

Signature of Plaintiff



Printed Name of Plaintiff

Clare Jacobs**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

*City**State**Zip Code*

Telephone Number

E-mail Address